

## South Staffordshire Local Plan

### Matters, Issues and Questions Response – Savills on behalf Indurent Strategic Land Ltd. and J&M Holt (11-04-25)

(Please note that Regulation 19 representation were made on behalf of St Modwen Strategic Land Limited and J&M Holt. St. Modwen Strategic Land Limited has now become Indurent Strategic Land Ltd.)

#### **Matter 12: Building a Strong Local Economy**

##### **Issue 1 – Whether the approach of Policy EC1 to sustainable employment growth is justified, effective and consistent with national policy**

Please find attached the representations made by Indurent Strategic Land Ltd (herein 'Indurent') and J&M Holt at Regulation 19 stage relating to Policy EC1.

##### **Question 1 – In terms of being justified and consistent with national policy:**

- a. What is the basis for this policy approach?
- b. Is the proposed employment land strategy justified through robust evidence and is it consistent with the Spatial Strategy and the National Planning Policy Framework?

**We object to Policy EC1 'Sustainable Economic Growth' as currently written, on the basis that the proposed employment land strategy is not currently justified or supported by appropriate fully tested evidence (NPPF Dec 2023 paragraph 35).**

Policy EC1 states that the existing supply of available employment land and allocations in the plan is enough to ensure there is a sufficient supply of employment land. We do not agree with this statement and, as set out in Savills Industrial and Logistics Needs Assessment work (Savills Industrial and Logistics (I&L) Needs Assessment – Addendum Note (May 2024). Savills Industrial and Logistics Needs Assessment (February 2024) and our response to Matter 4), we maintain our position that the employment need figure for the district has been underestimated and as such the plan as drafted is not fully justified or effective.

As such, while we do not raise any issues with the current policy text, we do request the inclusion of the following additional clause as set out below which enables 'windfall' employment sites to come forward in suitable locations to address the need position:

#### *Other Employment Locations*

*Where evidence indicates an immediate need or demand for additional employment land (Use Classes E(g), B2 and B8) that cannot be met from land allocated in this plan, the Council will consider favourably proposals that meet the identified need in appropriate locations outside of the district's settlements and freestanding strategic employment sites. Such development should be delivered in accordance with the requirements of other policies within the local plan.*

##### **Question 2 – In terms of being effective:**

- a. How does the employment land strategy adequately recognise the economic impacts of housing delivery?

When considering whether employment land strategy adequately recognise the economic impacts of housing delivery, the following Strategic Objectives of the Local Plan are highlighted:

*Strategic Objective 2: Meet the housing and employment needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham and Black Country Housing Market Area and wider Functional Economic Market Area. New housing will be focused*

*on sustainable locations within the district, with a particular focus on the district's most sustainable Tier 1 settlements; and*

*Strategic Objective 6: Develop an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, encouraging inward investment and job creation in key sectors such as advanced manufacturing and providing the skills to enable residents to access these jobs.*

As set out above the employment need figure for the district has been underestimated and as such the plan as drafted is not fully justified or effective. Sufficient employment space is required in the district to provide appropriate job opportunities in relation to the identified housing needs of the SSDC and the wider Black Country.

**b. How will the preferred employment land strategy be effective in meeting the range of identified quantitative and qualitative employment needs of the district for the plan period in a sustainable way?**

The Local Plan needs to ensure that a wide range of job opportunities can be delivered through the strategy advocated and the sites allocated. As set out in the Savills Industrial & Logistics Needs Assessment (Feb 2024) the industrial and logistics sector is a significant employer of at least 3.9 million people in England (paragraph 4.5.1). Section 4.6 of the Assessment highlights how well paid and diverse the jobs are from that sector. Within the sector since 2011 there has not only been an overall increase in jobs, but that there is an on-going shift towards higher-skilled requirements.

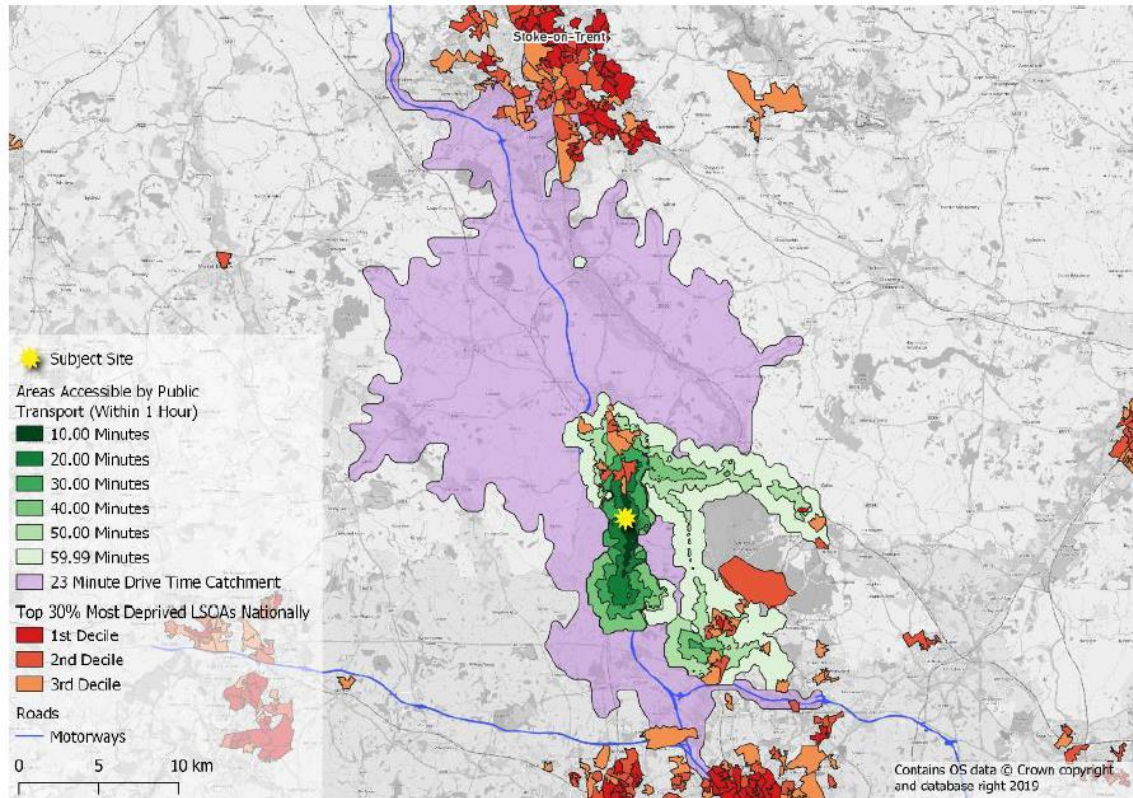
Bringing forward site E30 will also deliver apprenticeship and training opportunities during both the construction and operation periods. Indurent will be signing up to a meaningful Employment and Skills Plan to provide real opportunities for the wider population.

Site E30 is well located in terms of access to a large labour pool. Within a 23 minute drive time, which is the average home-to-work time for South Staffordshire (ONS User Request Data – 2018) there is a catchment of approximately 136,000 working-age people (aged 16-64). This represents a high level of workforce accessibility for future operators of the site.

The delivery of the site will also have a positive role to play in improving the employment prospects of deprived communities, with the logistics sector being particularly good at providing opportunities for those who may not otherwise be in work. Based on a recent independent survey undertaken by YouGov, Frontier-Economics found that 20% of people currently in logistics were previously unemployed, and that one in four within this group were long-term unemployed (Frontier Economics (2022) The Impact of Logistics Sites in the UK).

In terms of the E30 site specifically, Figure 1 below illustrates the areas accessible by public transport within an hour of the Subject Site during weekday mornings (07:00-09:00). The reachable areas within the hour journey time are broken down into 10 minute intervals (green shading) for reference. Figure 1 also presents the 23-minute drive time catchment referred to above, which is considered within commuting distance. This shows that within the areas accessible by public transport, and the 23 minute drive time catchment from the site, there are numerous neighbourhoods that score among the top 30% most deprived areas in England. This means that the Proposed Development will increase the employment opportunities available to the residents of these highly deprived neighbourhoods.

Figure 1 – Areas of Deprivation within Areas Accessible by Public Transport within an Hour of the Subject Site, and 23 Minute Drive Time Catchment



Source: IMS 2019, Savills 2023

It is therefore essential that a sufficient supply of sites such as Junction 13 of the M6 (E30) is identified and maintained to contribute to the delivery of high quality and diverse employment opportunities in the District.

**c. How will the preferred employment land strategy promote sustainable travel patterns, including from planned housing growth within the plan period and commuting patterns with neighbouring areas?**

In relation to allocation E30, it is highlighted that the site is in a sustainable location on the edge of Stafford and is accessible via bus routes along the A449 from nearby settlements such as Penkridge, which is a planned housing growth area. The Indurent scheme proposed improvements to the active travel route between the site and the south of Stafford, including providing improved active travel crossings of the junction 13. A Travel Plan has also been submitted with the current application which provides opportunities for further measures to improve access to the site.

As part of the current outline planning application for employment development at M6 Junction 13 (ref. E30), Indurent has prepared a Transport Assessment (TA). As part of the TA consideration has been given to the traffic impacts of the proposed development, including cumulative impacts of other development sites on the local and wider highway network.

**d. Should Policy EC1 provide clear criteria to determine the acceptability of specific proposals on employment land within the district?**

It is considered that employment land within the district should be protected, where appropriate, and clear justification should be set out to demonstrate the acceptability of any non-employment development proposals on employment land.

**e. How does the Plan address employment development on unallocated sites?**

It is considered that the Plan does not adequately address employment development on unallocated sites. As such a 'windfall' policy is required to enable employment sites to come forward in suitable locations. We have therefore requested in Question 1 the inclusion of additional text which enables 'windfall' employment sites where appropriate.

**Question 3 – Are any modifications necessary in the interests of soundness of the Plan?**

The inclusion of the proposed 'windfall' text is requested in the interests of soundness.

### Regulation 19 Consultation Representations

3. To which part of the Local Plan does this representation relate?

Paragraph	<div style="border: 1px solid black; width: 100px; height: 60px;"></div>	Policy	<div style="border: 1px solid black; padding: 5px;">Policy EC1 Sustainable Economic Growth</div>	Policies Map	<div style="border: 1px solid black; width: 170px; height: 60px;"></div>
-----------	--	--------	--	--------------	--

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<div style="border: 1px solid black; padding: 5px; text-align: center;">☑</div>	No	<div style="border: 1px solid black; width: 80px; height: 40px;"></div>
(2) Sound	Yes	<div style="border: 1px solid black; width: 80px; height: 40px;"></div>	No	<div style="border: 1px solid black; padding: 5px; text-align: center;">☑</div>
(3) Complies with the Duty to co-operate	Yes	<div style="border: 1px solid black; width: 80px; height: 25px;"></div>	No	<div style="border: 1px solid black; padding: 5px; text-align: center;">☑</div>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We **object** to Policy EC1 'Sustainable Economic Growth' as currently written, on the basis that the proposed employment land strategy is not currently justified or supported by appropriate fully tested evidence (NPPF paragraph 35). It is considered that the plan policies and related evidence base do not identify sufficient employment land to address the needs of South Staffordshire during the Local Plan period. As such, while we do not raise any issues with the current policy text, we do request the inclusion of an additional windfall site clause, as requested for Policies DS3 or EC4.

The policy aim (set out in paragraph 1 of the policy) of supporting '*measures to sustain and develop the local economy of South Staffordshire and encourage opportunities for inward investment and further economic development of the district*' is supported.

We also welcome the inclusion of M6 Junction 13, Dunston (E30) as one of six of the district's employment sites. Policy EC1 emphasises the need to '*ensure there is sufficient supply of employment land to meet the needs of the district over the plan period*' along with contributing towards the employment needs of the wider functional economic market area (FEMA) arising from

the Black Country authorities. This is key to the achieving the Local Plan's Economic Prosperity Strategic Objective and wider Local Plan Vision.

Policy EC1 states that the existing supply of available employment land and allocations in the plan is enough to ensure there is a sufficient supply of employment land. We do not agree with this statement and maintain our position that the employment need figure for the district has been underestimated and as such the plan as drafted is not fully justified or effective. Our full analysis is contained within the accompanying Savills Industrial and Logistics (I&L) Needs Assessment – Addendum Note (May 2024) (Appendix 2) and the Savills Industrial and Logistics Needs Assessment (February 2024) (Appendix 1)

In addition to an uplift in the overall employment needs figure, we maintain our position that a windfall or 'enabling policy' should be added to the Plan. This would allow further sites to come forward to meet the needs of the district and wider FEMA in the plan period. For example, St. Modwen Logistics control further land to the west of the Junction 13 allocation site (on the western side of the railway) which could address future demand in an appropriate location outside of the Green Belt.

Further detail is set out in our representations to policies DS3 and DS5.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*The employment land needs for South Staffordshire should be uplifted to address methodological weaknesses within the EDNA, to reflect significant demand arising within the wider FEMA and to embed flexibility in the delivery of employment land.*

An additional policy or policy wording (added to Policy DS3 or EC4) should be included that supports windfall employment coming forward. Please refer to our responses to these policies.

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To provide further clarification and oral contributions to the Local Plan hearing sessions.